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Marlene Dortch, Secretary
Federal Communications Commission
445 Twelfth St., SW
Washington, D.C. 20554

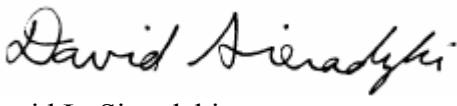
**RE: Reporting Requirements for U.S. Providers of International
Telecommunications Services; IB Docket No. 04-112**

Dear Ms. Dortch:

My colleague Joel Winnik and I of Hogan & Hartson LLP met today with David Krech, Susan O'Connell, Linda Blake, John Copes, Kiran Duwadi, Jerry Duvall, Peggy Reitzel, Mark Uretsky, and Irene Wu of the International Bureau, and Jim Lande of the Wireline Competition Bureau, regarding the proceeding referred to above. We discussed the treatment of traffic that originates in a foreign country, passes through the United States, and terminates in another foreign country, pursuant to the existing rules, filing and reporting guidelines, and the proposals in the Notice of Proposed Rulemaking in this proceeding. We maintained that foreign-to-foreign traffic that transits the United States is outside the FCC's jurisdiction and should not be subject to filing and reporting requirements.

If you have any questions, please contact Mr. Winnik or me.

Respectfully submitted,


David L. Sieradzki

cc: FCC staff members listed above